

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VINCENT MICHAEL MATTSON,

Plaintiff,

vs.

ENHANCED RECOVERY COMPANY,
LLC,

Defendant.

CASE NO. 1:17-cv-04895

District Judge Hon. Harry D. Leinenweber

Magistrate Judge Hon. M. David Weisman

JOINT MOTION FOR ENTRY OF AGREED CONFIDENTIALITY AGREEMENT

NOW COMES Plaintiff VINCENT MICHAEL MATTSON (“Plaintiff”) and Defendant ENHANCED RECOVERY COMPANY, LLC (“Defendant”) by and through their respective counsel (collectively “Parties”), and in support of their Joint Motion for Entry of Agreed Confidentiality Agreement, state as follows:

1. The Parties have met and conferred, and have agreed that a Confidentiality Agreement is warranted in this case. A copy of the Proposed Agreed Confidentiality Agreement is attached as **Exhibit 1**.

2. The Parties further stipulate and agree that the Proposed Agreed Confidentiality Agreement requested herein is not requested for purposes of delay and will not result in any prejudice to the Parties or to the Court.

3. Further, the instant request is made by the Parties in good faith.

WHEREFORE, Plaintiff Vincent Michael Mattson and Defendant Enhanced Recovery Company, LLC, by and through their respective counsel, respectfully requests this Honorable Court to enter an order that effectively adopts the Parties' proposed Agreed Confidentiality Agreement.

DATED: December 13, 2017

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: 

One of the Attorneys for
Enhanced Recovery Company, LLC
John T. Wilson III, Attorney No. 6278797
LEWIS BRISBOIS BISGAARD & SMITH, LLP
550 West Adams Street, Suite 300
Chicago, Illinois 60661
T: 312-345-1718
Email: John.T.Wilson@lewisbrisbois.com

Stephen H. Turner, Esq. (Admitted Pro Hac Vice)
Larissa G. Nefulda, Esq. (Admitted Pro Hac Vice)
LEWIS BRISBOIS BISGAARD & SMITH LLP
633 W. 5th Street, Suite 4000
Los Angeles, CA 90071
Telephone: 213-250-1800
Facsimile: 213-250-7900
Email: Stephen.Turner@lewisbrisbois.com
Email: Larissa.Nefulda@lewisbrisbois.com

DATED: December 13, 2017

SULAIMAN LAW GROUP, LTD.

By: s/ Nathan C. Volheim

One of the Attorneys for Plaintiff

Nathan C. Volheim

Sulaiman Law Group, Ltd.

2500 S. Highland Avenue, Suite 200

Lombard, Illinois 60148

(630) 575-8181

Email: nvolheim@sulaimanlaw.com

Counsel for Plaintiff Vincent Michael Mattson

CERTIFICATE OF SERVICE

The undersigned certifies, pursuant to Fed.R.Civ.P. 5 and L.R. 5.5, that a true and correct copy of the foregoing Joint Motion for Entry of Agreed Confidentiality Agreement was filed on February 14, 2018, with the clerk of the court using the CM/ECF system, which will send notice to counsel of record.

Nathan C. Volheim
Taxiarchis Hatzidimitriadis
Sulaiman Law Group, Ltd.
2500 South Highland Avenue
Suite 200
Lombard, Illinois 60148
T: 630.575.8181
nvolheim@sulaimanlaw.com
thatz@sulaimanlaw.com

Attorneys for Plaintiff Vincent Michael Mattson

A handwritten signature in black ink, appearing to read 'J. T. Wilson III', with a stylized flourish at the end.

Johner T. Wilson III